

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INDEPENDENT ASSET MANAGEMENT,
LLC,

Plaintiff,

- against -

DANIEL ZANGER,

Defendant.

Index No. 07-CV-6431 (JSR)

ECF

**PLAINTIFF'S PROPOSED
VOIR DIRE REQUESTS**

Plaintiff Independent Asset Management, LLC ("Plaintiff" or "IAM"), by its attorneys, Balestriere Lanza PLLC, hereby submits the following proposed voir dire and requests the Court to question prospective jurors concerning the subject matter of the submitted questions, together with any appropriate follow-up questions which may be necessitated by the answers to the voir dire questions.

1. What is your occupation?
2. What is your age?
3. Where do you live?
4. Are you married?
5. What is your spouse's occupation?
6. Do you have any children?
7. What are your children's occupations?
8. What is your education level?
9. Do you speak any foreign languages?

10. Have you ever lived outside the United States?
11. Have you had, or do you think you might have had, any dealings with Plaintiff Independent Asset Management?
12. Have you had, or do you think you might have had, any dealings with Defendant Daniel Zanger?
13. Have you had, or do you think you might have had, any dealings with the hedge fund, Independent Fund Limited?
14. Have you had, or do you think you might have had, any dealings with the hedge fund, Independent Fund Limited?
15. Have you or any member of your family ever invested in stocks, bonds, or other securities?
16. Have you or any member of your family ever invested in a mutual fund?
17. Have you or any member of your family ever invested in a hedge fund?
18. Plaintiff Independent Asset Management is represented in this case by Balestriere Lanza PLLC, located at 225 Broadway, New York, New York. Trial counsel is Craig Lanza. Have you ever met or had other contact with any of them?
19. Defendant Daniel Zanger is represented in this case by Jones Day, with offices in numerous cities, including at 222 East 41st Street, New York, New York. Trial counsel is Tom Sear and Mike Silberfarb. Have you ever met or had other contact with any of them?

20. Do any of your family or friends work for, or have they worked for, any of the attorneys for both parties?
21. This case will involve the testimony of several witnesses, and both the plaintiff and defendant have indicated that they might call the following persons as witnesses. Have you ever met or had other contact with any of the following persons:
 - a. Raymond Aronson
 - b. Ola Holmstrom
 - c. Joseph Porco
 - d. George Szele
 - e. Daniel Zanger
 - f. Ezra Zask
22. Have you ever served on a jury before?
23. On how many occasions?
24. What type of case?
25. Have you ever been a party to a civil lawsuit, arbitration, mediation, or proceeding before a tribunal?
26. If so, what type of case?
27. How was the claim resolved?
28. Have you ever testified as a witness in any legal proceeding to which you were *not* a party?

29. Have you, your friends, or any member of your family ever been employed or trained in the securities or stock trading profession? If so, please describe?

Dated: New York, New York
July 30, 2008

Respectfully submitted,

s/ Craig Stuart Lanza
Craig Stuart Lanza (CL-2452)
John Balestriere (JB- 3247)
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